

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Williamsport Division

IN RE:

Deborah L. Sawyer

Case No. 4:24-bk-02258-MJC

Chapter 13

Deutsche Bank National Trust Company, as Trustee
for Ameriquest Mortgage Securities Inc., Asset-
Backed Pass-Through Certificates, Series 2006-R1,
Movant

vs.

Deborah L. Sawyer ,
Debtor

**OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

Deutsche Bank National Trust Company, as Trustee for Ameriquest Mortgage Securities Inc., Asset-Backed Pass-Through Certificates, Series 2006-R1 ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 17), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on September 10, 2024.
2. Movant holds a security interest in the Debtor's real property located at 60 Central Ave, Wellsboro, PA 16901 (the "Property"), by virtue of a Mortgage.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on October 18, 2024 (Doc 17).
4. The Plan includes payments toward the Note and Mortgage with Movant per the POC, however the figures used by the Debtor are inaccurate. Although Movant has not yet filed

its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due Movant is \$117,186.93, whereas the Plan proposes to pay only \$0.00.

5. Furthermore, the Plan is significantly underfunded in proposing to pay \$30,000.00 and therefore not feasible.

6. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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IN RE: Deborah L. Sawyer	Case No. 4:24-bk-02258-MJC Chapter 13
Deutsche Bank National Trust Company, as Trustee for Ameriquest Mortgage Securities Inc., Asset- Backed Pass-Through Certificates, Series 2006-R1, Movant	
vs.	
Deborah L. Sawyer , Debtor	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing
OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN has been
electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Lisa A Rynard, Debtor's Attorney
240 Broad Street
Montoursville, PA 17754
larynard@larynardlaw.com

Jack N Zaharopoulos, Bankruptcy Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

United States Trustee, US Trustee
US Courthouse
1501 N. 6th St
Harrisburg, PA 17102

Via First Class Mail:

Deborah L. Sawyer
60 Central Avenue
Wellsboro, PA 16901

Date: October 29, 2024

/s/Mario Hanyon

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